

From: Kelley Oswalt <Kelley.Oswalt@trinityconsultants.com>
Sent: Monday, May 18, 2026 4:32 PM
To: Ken Livengood; Ifeoluwa Babarinde
Cc: John Walker; Tom Ellerbrock; Shane Presley
Subject: RE: Working Draft Permit -- SOP O4506/Project 39989, Pasadena Performance Products LLC/Pasadena Site

Follow Up Flag: Follow up
Flag Status: Completed

Hi Ifeoluwa,

We have reviewed the draft permit and it looks good. Please let us know if you need anything else to proceed.

Please also include everyone copied on this email chain on all future correspondence for this project.

Thanks!

Kelley Oswalt
Senior Consultant
Trinity Consultants
512-693-4191 (office)

From: Ken Livengood <ken.livengood@nextwaveenergy.com>
Sent: Monday, May 18, 2026 9:56 AM
To: Ifeoluwa Babarinde
Cc: John Walker; Tom Ellerbrock; Shane Presley; Kelley Oswalt
Subject: RE: Working Draft Permit -- SOP O4506/Project 39989, Pasadena Performance Products LLC/Pasadena Site

Ifeoluwa,

Did anyone from Next Wave respond to you? I wanted to make sure the loop was closed from our side.

Regards,

Ken Livengood
Operations Manager

Next Wave Energy Partners, L.P.
601 N. South St.
Pasadena, TX 77503
O: 713-346-9205
C: 913-608-2251
www.nextwaveenergy.com



From: Ifeoluwa Babarinde
Sent: Monday, May 11, 2026 9:54 AM
To: ken.livengood@nextwaveenergy.com
Cc: John Walker
Subject: Working Draft Permit -- SOP O4506/Project 39989, Pasadena Performance Products LLC/Pasadena Site

Good morning,

This is a follow up to the email sent on **04/23/2026**.

Please review the WDP and submit to me any comments you have on it by **05/15/2026**.
Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

Please let know should you have any questions.

Thank you for your cooperation.

Sincerely,

Ifeoluwa Babarinde (he/him)

**Environmental Permit Specialist
Operating Permits Section (Title V)
Air Permits Division
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
Ifeoluwa.babarinde@tceq.texas.gov
[\(512\) 239-3373](tel:(512)239-3373)**



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From: Ifeoluwa Babarinde
Sent: Thursday, April 23, 2026 2:11 PM
To: ken.livengood@nextwaveenergy.com
Cc: John Walker
Subject: Working Draft Permit -- SOP O4506/Project 39989, Pasadena Performance Products LLC/Pasadena Site

Good afternoon,

I have conducted a final technical review of the revision application for Site Operating Permit (SOP) Permit No. O4506 for Pasadena Performance Products LLC, Pasadena Site. An electronic copy of the updated Working Draft Permit (WDP) is attached for your review and approval. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

Please review the WDP and submit to me any comments you have on it by **05/07/2026**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

Please review the second portion of the "SOP Technical Review Fact Sheet" located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf. This guidance contains important information regarding WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified application information, including application updates supporting the WDP comments, is required. After final review of the WDP, additional changes supported by application updates may require certification. I will advise you of these changes at a later date. Prior to transmittal of the Public Notice/Announcement Authorization Package, a duly signed OP-CRO1 form may be required which includes the specific dates or time-period of all submitted application documentation that was not previously certified. I will advise you of this requirement prior to sending the Public Notice/Announcement Authorization.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at R6AirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This

submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Ifeoluwa Babarinde (he/him)

**Environmental Permit Specialist
Operating Permits Section (Title V)
Air Permits Division
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
Ifeoluwa.babarinde@tceq.texas.gov
[\(512\) 239-3373](tel:(512)239-3373)**



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From: Ifeoluwa Babarinde
Sent: Friday, April 10, 2026 1:19 PM
To: ken.livengood@nextwaveenergy.com
Cc: John Walker
Subject: Technical Review -- SOP O4506/Project 39989, Pasadena Performance Products LLC/Pasadena Site

Good afternoon,

I have been assigned to the Federal Operating Permit (FOP) revision application for Site Operating Permit (SOP) Permit No. O4506 for Pasadena Performance Products LLC, Pasadena Site. This application has been assigned Project No. 39989. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to help facilitate tracking.

I will advise you should I have any more questions or require additional information during the review process.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on one or more of the following:

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High-level terms in the SOP Applicable Requirement Summary Table. The high-level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

If you have any questions or concerns on any of these items, or think you need to provide any additional updates, please let me know and we can discuss further.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO or DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. However, application updates that are provided through email or physical mail will require certification using an original signature OP-CRO1. I will request the final OP-CRO1 submittal at the proper time.

Please be sure to notify me whenever any updates are submitted via STEERS.

As indicated on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to both EPA Region 6 at R6AirPermitsTX@epa.gov, and to the TCEQ regional office having jurisdiction over the facility. Related information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).

Please review the “SOP Technical Review Fact Sheet” located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf. This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit

Please do not hesitate to contact me should you ever have any questions about the guidelines, the project schedule, or any other details regarding your application, the review process, or the permit.

Thank you for your cooperation. I look forward to working with you during this project.

Sincerely,

Ifeoluwa Babarinde (he/him)

Environmental Permit Specialist
Operating Permits Section (Title V)
Air Permits Division
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
Ifeoluwa.babarinde@tceq.texas.gov
[\(512\) 239-3373](tel:(512)239-3373)



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MINOR REVISION APPLICATION

Site Operating Permit 04506

Pasadena Performance Products, LLC
Pasadena Site
CN605397520
RN101997104

Prepared By:

Kelley Oswalt – Senior Consultant
Lillian Rodriguez – Consultant

TRINITY CONSULTANTS

1800 West Loop South
Suite 1000
Houston, TX 77027
713-552-1371

March 2026

Project 264402.0133



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1. PROJECT INFORMATION

Pasadena Performance Products, LLC (PPP) owns the Pasadena Site, a petrochemical manufacturing facility in Harris County, Texas. Facilities at the site are operated under Site Operating Permit (SOP) O4506. The purpose of this application is to revise the SOP.

As part of this minor revision application, the following revisions are being requested:

- ▶ Incorporate the 1/21/2026 issuance of NSR permit 165444 into the Title V permit.

2. ADMINISTRATIVE FORMS

This section contains the following forms and information:

- ▶ OP-2 – Application for Permit Revision/Renewal

Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality

Date:	3/27/2026															
Permit No.:	04506															
Regulated Entity No.:	RN101997104															
Company Name:	Pasadena Performance Products, LLC															
For Submissions to EPA																
Has an electronic copy of this application been submitted (or is being submitted) to EPA?											X	YES		NO		
I. Application Type																
Indicate the type of application:																
	Renewal															
X	Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)															
	Significant Revision															
	Revision Requesting Prior Approval															
	Administrative Revision															
	Response to Reopening															
II. Qualification Statement																
For SOP Revisions Only											X	YES		NO		
For GOP Revisions Only												YES		NO		
III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)																
Indicate all pollutants for which the site is a major source based on the site's potential to emit:																
<i>(Check the appropriate box[es].)</i>																
X	VOC		NO _x		SO ₂		PM ₁₀		CO		Pb		HAPs			
Other:																
IV. Reference Only Requirements (For reference only)																
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?											X	YES		NO		N/A
V. Delinquent Fees and Penalties																
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.																

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date:	3/27/2026
Permit No.:	04506
Regulated Entity No.:	RN101997104
Company Name:	Pasadena Performance Products, LLC

Using the table below, provide a description of the revision.

Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	MS-A	NO	Multiple	N/A	165444	Incorporate the 1/21/2026 issuance of NSR permit 165444 into the Title V permit.

3. APPLICABLE REQUIREMENTS SUMMARY FORMS

This section contains the following forms and information:

- ▶ Form OP-REQ1 – Application Area-Wide Applicability Determinations and General Information (Pg. 89)

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 89)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
03/27/2026	O4506	RN101997104

For SOP applications, answer ALL questions unless otherwise directed.

- ◆ For GOP applications, answer ONLY these questions unless otherwise directed.

XII. NSR Authorizations (continued) - (Attach additional sheets if necessary for sections XII.E-J.)

- ◆ **H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area**

Authorization No.	Issuance Date	Authorization No.	Issuance Date	Authorization No.	Issuance Date
165444	01/21/2026				

- ◆ **I. Permits by Rule (30 TAC Chapter 106) for the Application Area**

A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.

PBR No.	Version No./Date	PBR No.	Version No./Date	PBR No.	Version No./Date
106.263	11/01/2001				
106.472	09/04/2000				
106.473	09/04/2000				
106.511	09/04/2000				

- ◆ **J. Municipal Solid Waste and Industrial Hazardous Waste Permits with an Air Addendum**

Permit No.	Issuance Date	Permit No.	Issuance Date	Permit No.	Issuance Date

Texas Commission on Environmental Quality

Title V Existing

4506

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	PASADENA SITE
Does the site have a physical address?	Yes
Physical Address	
Number and Street	601 N SOUTH ST
City	PASADENA
State	TX
ZIP	77503
County	HARRIS
Latitude (N) (##.#####)	29.725555
Longitude (W) (-###.#####)	95.173055
Primary SIC Code	0
Secondary SIC Code	
Primary NAICS Code	325110
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN101997104
What is the name of the Regulated Entity (RE)?	PASADENA PERFORMANCE PRODUCTS
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	601 N SOUTH ST
City	PASADENA
State	TX
ZIP	77503
County	HARRIS
Latitude (N) (##.#####)	29.421854
Longitude (W) (-###.#####)	-95.101833
Facility NAICS Code	
What is the primary business of this entity?	

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN605397520
Type of Customer	Partnership
Full legal name of the applicant:	
Legal Name	Pasadena Performance Products, LLC
Texas SOS Filing Number	802743009
Federal Tax ID	
State Franchise Tax ID	32064009700
State Sales Tax ID	

Local Tax ID	
DUNS Number	
Number of Employees	0-20
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	PASADENA PERFORMANCE PRODUCTS LLC
Prefix	MR
First	SHANE
Middle	
Last	PRESLEY
Suffix	
Credentials	
Title	DIRECTOR OF OPERATIONS & PLANT MANAGER

Enter new address or copy one from list:

Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	601 N SOUTH ST
Routing (such as Mail Code, Dept., or Attn:)	
City	PASADENA
State	TX
ZIP	77503
Phone (###-###-####)	7137145649
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	shane.presley@nextwaveenergy.com

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

Organization Name	TOM ELLERBROCK(PASADENA PERFOR...)
Prefix	PASADENA PERFORMANCE PRODUCTS LLC
First	MR
Middle	TOM
Last	ELLERBROCK
Suffix	
Credentials	
Title	SR DIRECTOR ENGINEERING & ENVIRONMENTAL

Enter new address or copy one from list

Mailing Address

Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	601 N SOUTH ST
Routing (such as Mail Code, Dept., or Attn:)	
City	PASADENA
State	TX
Zip	77503
Phone (###-###-####)	7134963103
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	Tom.ellerbrock@nextwaveenergy.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

Organization Name

KEN LIVENGGOOD(PASADENA PERFOR...)

PASADENA PERFORMANCE PRODUCTS LLC

Prefix

MR

First

KEN

Middle

Last

LIVENGGOOD

Suffix

Credentials

Title

PROCESS ENGINEER

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

Mailing Address (include Suite or Bldg. here, if applicable)

601 N SOUTH ST

Routing (such as Mail Code, Dept., or Attn:)

City

PASADENA

State

TX

ZIP

77503

Phone (###-###-####)

7133469205

Extension

Alternate Phone (###-###-####)

Fax (###-###-####)

E-mail

ken.livenggood@nextwaveenergy.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

29 Deg 43 Min 32 Sec

3) Permit Longitude Coordinate:

95 Deg 10 Min 23 Sec

4) Is this submittal a new application or an update to an existing application?

New Application

4.1. What type of permitting action are you applying for?

Streamlined Revision

4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
5) Who will electronically sign this Title V application?	Duly Authorized Representative
6) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)	
Attach OP-2 (Application for Permit Revision/Renewal)	
Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)	
Attach OP-REQ2 (Negative Applicable Requirement Determinations)	
Attach OP-REQ3 (Applicable Requirements Summary)	
Attach OP-PBRSUP (Permits by Rule Supplemental Table)	
Attach OP-SUMR (Individual Unit Summary for Revisions)	
Attach OP-MON (Monitoring Requirements)	
Attach OP-UA (Unit Attribute) Forms	
If applicable, attach OP-AR1 (Acid Rain Permit Application)	
Attach OP-CRO2 (Change of Responsible Official Information)	
Attach OP-DEL (Delegation of Responsible Official)	
Attach any other necessary information needed to complete the permit.	
[File Properties]	
File Name	PPP O4506 Rev App 2026-0327.pdf
Hash	7C96D651C085DB1E28F6C8A4B255893B2104793131820D6AAE1DDC79C6501C63
MIME-Type	application/pdf
An additional space to attach any other necessary information needed to complete the permit.	

Expedite Title V

1) Per Texas Health and Safety Code, Section 382.05155, does the applicant want to expedite	No
---	----

the processing of this application?

Certification

I certify that I am the Duly Authorized Representative for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

1. I am Tom Ellerbrock, the owner of the STEERS account ER069629.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 4506.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Tom Ellerbrock OWNER OPERATOR

Account Number:	ER069629
Signature IP Address:	12.55.108.110
Signature Date:	2026-03-30
Signature Hash:	B529A602A410DAB71508CC2CA62688F8A965BBC078F50A1DBBBF31B72002CC6D
Form Hash Code at time of Signature:	DACF5BF2090FF6394FCB57D1AF132AF587EB7A0F161CA4E183ACDB37198CF2C6

Submission

Reference Number:	The application reference number is 911669
Submitted by:	The application was submitted by ER069629/Tom Ellerbrock
Submitted Timestamp:	The application was submitted on 2026-03-30 at 09:35:49 CDT
Submitted From:	The application was submitted from IP address 12.55.108.110
Confirmation Number:	The confirmation number is 758554
Steers Version:	The STEERS version is 6.94
Permit Number:	The permit number is 4506

Additional Information

Application Creator: This account was created by Kelley Oswald